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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1 1 CONGRESS STREET, SUITE 1100 BOSTON, MASSACHUSETTS 02114-2023

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER REQUIRES PROMPT RESPONSE

June 13, 2008

John Kent, Plant Manager Quebecor World Eusey Press Inc. 27 Nashua Street Leominster, MA 01453

Re:

Clean Air Act Testing Order Docket No. AAA-08-0026

Dear Mr. Kent:

The United States Environmental Protection Agency is evaluating whether Quebecor World Eusey Press Inc. ("Quebecor") is in compliance with state and federal requirements under the Clean Air Act, 42 U.S.C. §§7401 to 7671q (the Act). These requirements include but are not limited to the Massachusetts Department of Environmental Protection ("MassDEP") Approval Modification dated June 4, 2004 and Plan Approval dated June 21, 2000. These plan approvals were issued under Massachusetts regulations found at 310 CMR 7.02.

On May 16, 2007, EPA conducted an inspection of Quebecor's facility located at 27 Nashua Street in Leominster, Massachusetts. During this inspection, EPA confirmed that Quebecor uses a catalytic oxidizer to control the volatile organic compound (VOC) emissions from its printing processes.

Section 114(a)(1) of the Act, 42 U.S.C. Section 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act.

This letter orders Quebecor to sample and test the emissions from its catalytic oxidizer to determine compliance with the VOC limits found in Quebecor's plan approvals.

Therefore, within the number of days specified in each paragraph below, Quebecor is required to provide all the information and take the steps outlined below for the Leominster, Massachusetts facility.

- 1. Within seven days of receipt of this RR, contact EPA's Bill Osbahr at 617-918-8389 to schedule a pre-test conference. At the pre-test conference, EPA will review with Quebecor the various sampling, monitoring, testing, and analysis locations, procedures, and methods to be followed on the date(s) of the tests.
- 2. Within 60 days of receipt of this RR, prepare and mail to EPA and MassDEP a pre-test protocol for testing the destruction efficiency of the catalytic oxidizer using the applicable methods in 40 C.F.R. Part 60, Appendix A.
- 3. Within 60 days of receipt of this RR, prepare and mail to EPA and DEP a pre-test protocol for testing the capture efficiency of the presses using the applicable methods in 40 C.F.R. Part 60, Appendix A.
- 4. Within 120 days of receipt date of this RR, hold a pre-test conference with EPA, and schedule the testing date(s).
- 5. Within 150 days of receipt of this RR, conduct a destruction efficiency test on the catalytic oxidizer and capture efficiency tests on the presses.
- 6. Within 30 days of completing each test, submit the completed test report to EPA and MassDEP.

Attachment A to this RR provides lists of required elements for pre-test protocols and post-test final reports.

Submissions required by this letter shall be mailed to all of the following:

Steven J. Calder, Environmental	Bill Osbahr, Environmental	John Kronopolus,
Engineer (MC-SEA)	Engineer (MC-EIA)	Compliance & Enforcement
US EPA Region I	US EPA Region I	Chief
One Congress Street Suite 1100	11 Technology Drive	MassDEP-CERO
Boston, Massachusetts 02114	North Chelmsford, MA	627 Main Street
	01863-2431	Worcester, MA 01608

Be aware that if Quebecor does not provide the requested information and conduct the required tests in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

Quebecor may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R §2.203(b). Note that certain

categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Quebecor. Be aware that Massachusetts may have different rules and regulations governing the protection of confidential business information.

If you have any questions regarding this requirement, please contact Environmental Engineer Steven Calder, at (617) 918-1744, or have your attorney call Senior Enforcement Counsel Thomas T. Olivier, at (617) 918-1737.

Sincerely,

Susan Studlien, Director

Office of Environmental Stewardship

cc: Bill Osbahr, EPA OEME

John Kronopolus, MassDEP

San Silvernan, acting for

Enclosure